

EXHIBIT B

Burton, Emma

From: Burton, Emma
Sent: Wednesday, July 22, 2020 6:27 PM
To: 'Jennifer Kelly'
Cc: Scott DiCarlo; Alfonso.Rogers@kccllc.com; sraiter@larsonking.com; Dewitt M. Lovelace; Sparky (gmail.com); DonBarrettPA@gmail.com; Sasse, Daniel; Arbabi, Deborah; Jon Cuneo; Rives, Ann; Lines, Joe
Subject: RE: Auto Parts - Reserve Distribution Inquiry

Thanks, Jen, but that was not our understanding following the July 15 call. Is class counsel now explicitly refusing to allow adequate time for briefing on this issue? We are happy to discuss an expedited schedule with you, and if we file an emergency motion to delay distribution the court is likely to order us to meet and confer over a briefing schedule anyway.

I am available by phone this evening to discuss (301-602-9536). Otherwise, we request your response by 10amEST tomorrow (07/23).

Best,
Emma

From: Jennifer Kelly [mailto:jkelly@cuneolaw.com]
Sent: Wednesday, July 22, 2020 5:07 PM
To: Burton, Emma
Cc: Scott DiCarlo; Alfonso.Rogers@kccllc.com; sraiter@larsonking.com; Dewitt M. Lovelace; Sparky (gmail.com); DonBarrettPA@gmail.com; Sasse, Daniel; Arbabi, Deborah; Jon Cuneo; Jennifer Kelly
Subject: RE: Auto Parts - Reserve Distribution Inquiry

External Email

Hi Emma,

Our understanding was that you would try to obtain an order from the court directing us not to distribute reserve funds by July 31, 2020. That is to say, we plan to move forward with reserve fund distribution as soon as possible after July 31, 2020, unless an order is in place at that time.

Take care,

Jen

Jennifer E. Kelly
Cuneo Gilbert & LaDuka, LLP
Suite 200
4725 Wisconsin Avenue, NW
Washington, DC 20016
202-789-3960 (main)

202-905-0995 (direct)

202-734-8537 (cell)

jkelly@cuneolaw.com

From: Burton, Emma <EBurton@crowell.com>

Sent: Friday, July 17, 2020 1:06 PM

To: Jennifer Kelly <jkelly@cuneolaw.com>

Cc: Scott DiCarlo <Scott.DiCarlo@kccllc.com>; Alfonso.Rogers@kccllc.com; sraiter@larsonking.com; Dewitt M. Lovelace <dml@lovelachelaw.com>; Sparky (gmail.com) <sparkylovelace@gmail.com>; DonBarrettPA@gmail.com; Sasse, Daniel <DSasse@crowell.com>; Arbabi, Deborah <DArbabi@crowell.com>; Jon Cuneo <JonC@cuneolaw.com>

Subject: RE: Auto Parts - Reserve Distribution Inquiry

Hi Jen –

Thank you for following-up on the reserve fund eligibility issue. As we discussed on the Wednesday call, we are preparing to file a motion no later than July 31, 2020, based on Jon's representation that no reserve funds would be distributed prior to that date.

Please let us know if you have any questions.

Best,

Emma

Emma Burton | Crowell & Moring LLP

1001 Pennsylvania Avenue NW | Washington, DC 20004

202-624-2974 (direct) | 301-602-9536 (mobile)

From: Jennifer Kelly [<mailto:jkelly@cuneolaw.com>]

Sent: Thursday, July 16, 2020 1:37 PM

To: Burton, Emma

Cc: Scott DiCarlo; Alfonso.Rogers@kccllc.com; sraiter@larsonking.com; Dewitt M. Lovelace; Sparky (gmail.com); DonBarrettPA@gmail.com; Sasse, Daniel; Arbabi, Deborah; Jon Cuneo; Jennifer Kelly

Subject: RE: Auto Parts - Reserve Distribution Inquiry

External Email

Emma,

As Jon indicated we would during our call yesterday, we checked with our co-lead counsel and we cannot accommodate your request regarding reserve fund distributions.

Take care,

Jen

Jennifer E. Kelly
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jkelly@cuneolaw.com

From: Burton, Emma <EBurton@crowell.com>
Sent: Wednesday, July 15, 2020 12:06 PM
To: Jon Cuneo <JonC@cuneolaw.com>
Cc: Scott DiCarlo <Scott.DiCarlo@kccllc.com>; Alfonso.Rogers@kccllc.com; sraiter@larsonking.com; Dewitt M. Lovelace <dml@lovelacelaw.com>; Sparky (gmail.com) <sparkylovelace@gmail.com>; DonBarrettPA@gmail.com; Jennifer Kelly <jkelly@cuneolaw.com>; Sasse, Daniel <DSasse@crowell.com>; Arbabi, Deborah <DArbabi@crowell.com>
Subject: RE: Auto Parts - Reserve Distribution Inquiry

You can call me directly – 301-602-9536.

Thanks.

From: Jon Cuneo [<mailto:JonC@cuneolaw.com>]
Sent: Wednesday, July 15, 2020 12:05 PM
To: Burton, Emma
Cc: Scott DiCarlo; Alfonso.Rogers@kccllc.com; sraiter@larsonking.com; Dewitt M. Lovelace; Sparky (gmail.com); DonBarrettPA@gmail.com; Jennifer Kelly; Sasse, Daniel; Arbabi, Deborah
Subject: Re: Auto Parts - Reserve Distribution Inquiry

External Email

I cannot get on your line. How can Jen and I reach you? Jon

Sent from my iPad

On Jul 15, 2020, at 8:26 AM, Burton, Emma <EBurton@crowell.com> wrote:

Hi Jon –

Yes, we can shift call to 12:00EST today. I will update the call invite shortly.

Thanks,
Emma

From: Jon Cuneo [<mailto:JonC@cuneolaw.com>]
Sent: Wednesday, July 15, 2020 7:34 AM
To: Burton, Emma
Cc: Scott DiCarlo; Alfonso.Rogers@kccllc.com; sraiter@larsonking.com; Dewitt M. Lovelace; Sparky (gmail.com); DonBarrettPA@gmail.com; Jennifer Kelly; Sasse, Daniel; Arbabi, Deborah
Subject: Re: Auto Parts - Reserve Distribution Inquiry

External Email

Good morning Emma (and Jen)

I've had a change in schedule, alas, and need to move our call. Would noon work?

Jon

Sent from my iPhone

On Jul 14, 2020, at 4:28 PM, Burton, Emma <EBurton@crowell.com> wrote:

Hi Jon –

Tomorrow (Wednesday) at 10:00amEST works well on my end.

I will forward a calendar invite with a dial-in number shortly and look forward to connecting then.

Best,
Emma

From: Jon Cuneo [<mailto:JonC@cuneolaw.com>]
Sent: Tuesday, July 14, 2020 4:02 PM
To: Burton, Emma
Cc: Scott DiCarlo; Alfonso.Rogers@kcdlc.com; sraiter@larsonking.com; Dewitt M. Lovelace; Sparky (gmail.com); DonBarrettPA@gmail.com; Jennifer Kelly; Sasse, Daniel; Arbab, Deborah
Subject: Re: Auto Parts - Reserve Distribution Inquiry

External Email

10am tomorrow, Wednesday 7/15?

Sent from my iPhone

On Jul 13, 2020, at 10:59 PM, Burton, Emma <EBurton@crowell.com> wrote:

Jonathan –

Thank you for your letter regarding reserve fund distribution in the Dealership settlements. I would like to schedule a time to discuss in more detail. Please let me know your availability for a call this week.

Best,

Emma

Emma Burton | Crowell & Moring LLP
1001 Pennsylvania Avenue NW | Washington, DC 20004
202-624-2974 (direct) | 301-602-9536 (mobile)

From: Jennifer Kelly [<mailto:jkelly@cuneolaw.com>]
Sent: Friday, July 10, 2020 5:29 PM
To: Burton, Emma
Cc: Scott DiCarlo; Alfonso.Rogers@kccllc.com; Jon Cuneo; 'sraiter@larsonking.com'; Dewitt M. Lovelace; Sparky (gmail.com); Jennifer Kelly; DonBarrettPA@gmail.com
Subject: Auto Parts - Reserve Distribution Inquiry

External Email

Ms. Burton –

Please see the attached letter responding to your settlement reserves distribution inquiry.

Take care,

Jen

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<2020.07.10 Cuneo Letter to E Burton re Reserves Distribution.pdf>